From: <u>Mishkin, Katherine</u>
To: <u>Ofrane, Rebecca</u>

Subject: FW: Round 1 sample analyses - Cabo ROjo Date: Monday, January 13, 2014 7:57:56 AM

I guess its something we also overlooked in the workplan. Do you think we should talk to her about adding another round or make that contingent on what is found in the 1 round?

Katie

Katherine Ryan Mishkin

Geologist

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From: Zeno, Denise

Sent: Monday, January 13, 2014 7:46 AM

To: Mishkin, Katherine

Subject: RE: Round 1 sample analyses - Cabo ROjo

Hi Katie!

By an involuntary error I overlooked your email on the sampling rounds for Cabo Rojo.

To answer your question, no changes have been made to the original workplan. There is only 1 round of sampling.

Do we need to add additional sampling rounds to the RI?

Please advice

Denise

From: Mishkin, Katherine

Sent: Friday, December 27, 2013 10:48 AM

To: Zeno, Denise Cc: Ofrane, Rebecca

Subject: RE: Round 1 sample analyses - Cabo ROjo

Hi Denise and Happy New Year,

Was there always only 1 round of RI sampling planned for this site or was this changed more

recently? Katie

From: Zeno, Denise

Sent: Tuesday, December 24, 2013 7:06 AM To: Schofield, Susan; Ofrane, Rebecca Cc: Hauptman, Mel; Mishkin, Katherine

Subject: RE: Round 1 sample analyses - Cabo ROjo

Good Morning, Susan!

Please add the 1,4 dioxane to the analytical list for this sampling event.

thanks

Happy Holidays!

From: Schofield, Susan < SchofieldSE@cdmsmith.com>

Sent: Monday, December 23, 2013 9:09 AM

To: Ofrane, Rebecca; Zeno, Denise **Cc:** Hauptman, Mel; Mishkin, Katherine

Subject: RE: Round 1 sample analyses - Cabo ROjo

When I receive this direction from Denise, I will add 1,4-dioxane to the analytical list (as an SVOC). Becky, please be aware that the Cabo Rojo work plan includes one round of monitoring well sampling only.

Happy holidays to all,

Susan

From: Ofrane, Rebecca [mailto:Ofrane.Rebecca@epa.gov]

Sent: Monday, December 23, 2013 10:00 AM

To: Zeno, Denise

Cc: Hauptman, Mel; Schofield, Susan; Mishkin, Katherine **Subject:** RE: Round 1 sample analyses - Cabo ROjo

Hi Denise -

Yes, let's include 1,4-dioxane on the SVOC list at least for this first round of sampling. Once we have results, we can remove it from the analyte list in the future if appropriate. And we'll include all the wells, not just a random selection as in San German.

Let me know if you have any questions. Thanks,

Becky Ofrane

(212) 637 4302

From: Zeno, Denise

Sent: Thursday, December 19, 2013 3:10 PM

To: Ofrane, Rebecca

Cc: Hauptman, Mel; Susan Schofield

Subject: FW: Round 1 sample analyses - Cabo ROjo

Can you please read Susan's email and give me your opinion?

thanks Denise

From: Schofield, Susan < SchofieldSE@cdmsmith.com>

Sent: Thursday, December 19, 2013 12:31 PM

To: Zeno, Denise

Subject: Round 1 sample analyses - Cabo ROjo

Buenas tardes Denise,

I will be submitting the CLP/DESA laboratory request for Cabo Rojo within the next few days, with the plan to start sampling on or about January 27, 2014. According to our work plan approved by EPA, the samples will only be analyzed for Target Compound List volatiles and water quality/monitored natural attenuation parameters.

Based on experience with recent sampling for the San Germán project in Puerto Rico, the EPA risk assessors were very concerned that we do not have laboratory analyses for the compound 1,4-dioxane. When this compound is analyzed with the TCL VOC list, the results are automatically rejected during data validation and, in fact, DESA does not even report results for 1,4-dioxane because they know the results will be rejected.

1,4-dioxane can be analyzed with the SVOC list, but the compound must be specifically requested to be part of the SVOC list. The results from this analysis are more likely to be considered valid and can be used for site evaluation purposes.

Now, my question – do you want to check with your risk assessors for the project to determine if

they consider results for 1,4-dioxane to be critical for the Cabo Rojo project? Since we are only scoped to analyze for VOCs, we will not have any usable results for this compound. If this compound is viewed as critical, then we will have to request analysis for that one compound as an SVOC (this is what we are doing for the next round of groundwater sampling at San Germán). If 1,4-dioxane results are viewed by the risk assessors as critical, then I would anticipate that budget impacts will be minimal since we did not install as many wells as was assumed in the work plan. Thanks – I thought it best to highlight this potential problem early, before sampling, rather than have it come up after the field work is completed.

Susan

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